

310383



Site Traffic Control Plan
Superior Barrel & Drum Site Gloucester County, NJ

November 2013

TRAFFIC CONTROL PLAN

FOR

SUPERIOR BARREL AND DRUM SITE GLOUCESTER COUNTY, NJ

PREPARED FOR:


U.S. EPA REGION II
2890 WOODBRIDGE AVENUE
EDISON, NJ 08837

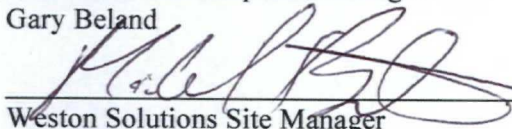
CONTRACT NO.: EP-S2-10-01
TASK ORDER NO.: 67

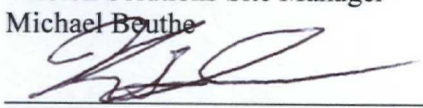
PREPARED BY:

KEMRON
ENVIRONMENTAL SERVICES
1359A Ellsworth Industrial Blvd NW
Atlanta, GA 30318

November 7, 2013


KEMRON Site Response Manager
Gary Beland


Weston Solutions Site Manager
Michael Bouthier


U.S. EPA On-Scene Coordinator
Keith Glenn


Date


Date


Date

KEMRON
ENVIRONMENTAL SERVICES

TABLE OF CONTENTS

1.0 INTRODUCTION	2
2.0 BACKGROUND	2
3.0 LOCATION	3
4.0 ENTRY	3
5.0 SUPPORT ZONE	4
6.0 EXCLUSION ZONE	4
7.0 SPEED LIMITS	4
8.0 CONCLUSION	4

Appendix A: Site Map – A map showing the aerial location of the Site and surrounding properties.

Appendix B: Site Features Map – A map indicating operational features of the Site, including the works zones.

Appendix C: Support Zone Map – A map showing designated parking areas, pedestrian zones along Jacob Harris Lane, and the location of the restroom facilities.

1.0 INTRODUCTION

The purpose of this Traffic Control Plan is to document the appropriate measures taken by Kemron Environmental Services to ensure a safe working environment for all personnel working at the Superior Barrel and Drum Site. This Traffic Control Plan outlines the areas designated for parking, pedestrian crossing, and locations of critical infrastructure as well as speed restrictions throughout the property,

2.0 BACKGROUND

On August 29, 2013 the New Jersey Department of Environmental Protection ("NJDEP") notified the EPA Region 2 Regional Emergency Operations Center of deteriorated conditions at the Superior Barrel and Drum Site, a former drum and container reconditioning facility and wholesale industrial supplier. NJDEP Emergency Response personnel requested the assistance of EPA OSCs with investigating conditions of containers at the facility.

On August 30, 2013 EPA OSCs met with NJDEP and Gloucester County officials at the Superior Barrel and Drum Site. Thousands of containers, mostly 275-gallon totes and 55-gallon drums, were observed along a public road which borders the Site (Jacob Harris Lane) as well as in the woods, wetlands, and elsewhere throughout the property. Drums and other containers were stacked several high in numerous locations and were in various states of deterioration. Many containers were found to be leaking, void of tops, exposed to weather elements, rusted, damaged due to gunshots, stored improperly, and laying on their sides. Some containers were found in standing water. Numerous trailers, most of which are heavily damaged, were also found to be open and containing numerous 55-gallon drums. Thermal imaging indicated that most of the containers throughout the Site were full of contents, but the majority was not labeled. Labels on several of the containers indicated that their contents were flammable liquids, corrosives, marine pollutants, flammable solids, oxidizers or non-hazardous materials. County officials indicated that attempts to reach the property owner had failed numerous times. The owner had filed for bankruptcy in 2012 but the case was dismissed due to lack of information provided by the plaintiff. Elk Township was planning foreclosure proceedings due to back property taxes owed, however the Gloucester County Fire Marshalls Office recommended not doing so due to Site conditions.

NJDEP collected samples from four random 55-gallon drums and analyzed them using field screening tests, including photo-ionization detection and hazardous material categorization ("HazCat") analysis. Results indicated that the materials were corrosive and highly flammable, and had high levels of volatile organic compounds ("VOCs"). The characteristics of these materials did not reflect the labels on the containers from which they originated.

NJDEP referred the Site to EPA on August 30, 2013 due to the conditions at the Site, including drum contents spilled in wetlands, contents pooling alongside the road, and unsecured access to the facility. On August 30, 2013, EPA contacted the property owner, who also owns the seemingly abandoned on-site business, to request access to perform an assessment and investigation of container contents. The property owner stated that all containers located inside the on-site building contained non-hazardous materials, while the contents of the containers located outside the building were unknown.

Following numerous attempts to obtain access to the Site from the property owner and issuance of an Administrative Order to the property owner for Site access, on September 12, 2013, EPA obtained an Administrative Warrant for entry onto the Superior Barrel and Drum Site from a United States Magistrate Judge. The warrant allows for entering, investigating and securing the property as well as sampling of containers located on-site.

On September 13, 2013, the EPA Removal Action Branch ("RAB") initiated a removal assessment of the Site. As part of these operations, samples were collected from a random selection of containers throughout the Site for HazCat field analysis with assistance from EPA Removal Support Team ("RST") and Emergency and Rapid Response Services ("ERRS") contractors. Between September 13 and 27, 2013, a total of 252 containers were opened and aliquots of the contents were collected for HazCat analysis. The analysis indicated the presence of oxidizers, flammable liquids, flammable solids and combustible liquids within containers on-site. Many of the containers contained multiple phases of material (i.e., liquids, sludges and solids), and handheld monitoring equipment indicated that the head space (air) within many of the containers had high concentrations of VOCs.

A total of 84 samples (including six Quality Assurance/Quality Control samples) from 79 containers were sent off-site for confirmatory laboratory analysis. Environmental samples, including 36 surface soil and 4 surface water samples, were also collected and sent for confirmatory laboratory analysis. The analysis identified the presence of numerous CERCLA-designated hazardous substances within the on-site containers, surface soil and surface water, including benzene, toluene, trichloroethylene, ethylbenzene, xylenes, polychlorinated biphenyls ("PCBs") and lead. Many of these compounds were found in containers that are actively leaking onto surface soils. Similarities between the hazardous substances found within the containers and the soil verifies that the on-site soil contamination is attributable to releases from the containers.

In addition to the HazCat and laboratory analyses, a container count was conducted. Approximately 2,000 containers were identified, not including hundreds of drums within deteriorated trailers which were not safe to access. A large proportion of the containers were weathered and in poor condition. Drums were found to be bulging, punctured, rusted, and void of tops. Several drums and containers were found in standing water throughout the property, and many were located within the National Wetlands designated by the U.S. Fish and Wildlife Service.

Based on the results of the removal assessment and failed attempts to reach the property owner, on September 27, 2013 EPA obtained an Administrative Warrant for a removal action at the property from a United States Magistrate Judge. In addition to entering the property, securing the Site and sampling various media, the warrant allows for removal of containers of hazardous substances, decontamination of tanks, clean-up of chemical storage and process areas, off-site disposal of all materials removed from the site and further assessment to determine if additional response actions are necessary.

Following receipt of the Administrative Warrant for a Removal Action, EPA initiated a removal action at the Site on September 27, 2013.

3.0 LOCATION

The Superior Barrel and Drum Site is located at 798 Jacob Harris Lane, also known as 830 Jacob Harris Lane (formerly New Jersey Avenue), in Elk Township, Gloucester County, New Jersey (coordinates 39.6869, -75.132314; Block 30, Lot 4). Jacob Harris Lane is a public, mostly paved road which becomes an unpaved dirt road approximately 650 feet north of the Site; the entrance to the Site is along the dirt road. The facility consists of one main processing building and numerous trailers located throughout the 5.51-acre property (Site map attached as Appendix A). The Site is bordered to the north by Industrial Drum Company, a competitor in the drum reconditioning business. A chain-link fence separates the two properties. Jacob Harris Lane marks the eastern boundary of the Site, beyond which is a densely forested private property. To the south are private, undeveloped lands which are also densely wooded with several marshy areas. The Site is bordered to the west by undeveloped, densely forested land and State Route 55, a major highway. The closest residential properties are located approximately 0.25 mile east and southeast of the Site along Whig Lane. These properties obtain potable water from private wells.

4.0 ENTRY

Access to the Site is gained through Jacob Harris Lane. This is a public road that is maintained by the Township of Elk. Unpaved as one moves closer to the Site entrance, this road is not utilized by many citizens. The property owner located to the south of Superior Barrel and Drum utilizes the road for access to private property where wooded lands are used for hunting. Although no speed limit signs are posted on the unpaved stretch of Jacob Harris Lane, the speed limit is 25 mph.

5.0 SUPPORT ZONE

As outlined in the Health and Safety Plan, the Site has been delineated into different work zones, including the Support Zone (see the Site Features Map in Appendix B). The Support Zone has been designed as the "clean" area where the office trailer is located along with parking. All personnel and visitors are to park in the Support Zone upon entry to the Site (refer to the Support Zone Map in Appendix C). Vehicles shall be backed into spaces to ensure a prompt exit should an emergency evacuation be necessary. Vehicles shall be locked so that valuables and equipment will not be stolen or taken without permission.

Private vehicles are prohibited from driving beyond the Support Zone. All personnel or visitors will utilize commercial vehicles when driving into the Contamination Reduction Zone and further.

Restrooms are located on the east side of Jacob Harris Lane across the office trailer. Personnel will need to walk across the road when utilizing the facilities. Although there is little vehicular traffic along the road, personnel will use caution when crossing the road. Personnel will look

twice in both directions before crossing the road. When leaving the facilities, care will be taken when opening doors to the toilets and crossing back to the Site.

6.0 EXCLUSION ZONE

The Exclusion Zone shall be well defined with high visibility fencing, signs, and gates. This is the area where contamination is known or suspected to be located. No personal vehicles will enter the Exclusion Zone. Only needed equipment, such as bobcats and forklifts, will enter and work in this zone. Exceptions will be made during load out of materials and containers. The northern area of the property will be established for loading of materials to be sent for disposal.

7.0 SPEED LIMIT

Equipment operators will maintain a safe speed when working in the Exclusion Zone. Although some equipment does not have an indication of speed, all efforts to maintain movement no greater than 5 mph shall be performed. Any transportation trucks utilized for disposal will maintain a 5 mph speed limit when driving in the load-out area(s). Kemron will use spotters, as outlined in the Health and Safety Plan, when heavy equipment is utilized.

Although speed limit signs are not located along Jacob Harris Lane, vehicles associated with Superior Barrel and Drum will not exceed 25 mph. Signs will not be posted along the road unless done so by the municipality, who maintains the road.

8.0 CONCLUSION

This document is to be used as a guideline when operating vehicles in and near the Superior Barrel and Drum Site. All personnel must use common sense when driving, parking, walking the Site or crossing the road. New Jersey Traffic Laws will be adhered to at all times when operating vehicles on and off the job site. Operational activities change throughout the course of a removal action and this plan should be flexible enough to accommodate any changes or exceptions necessary to perform appropriate actions. Site Managers have the ability to alter recommendations and guidelines outlined in this Traffic Control Plan to ensure safe and efficient operations.

Appendix A: Site Map



© 2013 Google

Google earth

Google Earth Pro

feet
meters

1000
300



Appendix B: Site Features Map



Appendix C: Support Zone Map

